

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Efficient Enterprise Solutions, LLC., a New
York, LLC,

Plaintiffs,

v.

Innoneo Health Technologies Inc., a Delaware
Corporation,

Defendant.

Case No. 1:23-CV-09437-JLR

**STIPULATION FOR ENTRY OF
CONSENT JUDGMENT**

STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff, Efficient Enterprise Solutions, LLC, a New York LLC (“EE Solutions”), through its undersigned counsel, and Defendant, Innoneo Health Technologies, Inc., a Delaware Corporation (“Innoneo”), through its undersigned counsel, stipulate and agree as follows:

1. Defendant, Innoneo, agrees to indebtedness to Plaintiff, EE Solutions in a total amount of \$211,742.26 dollars for outstanding invoices \$37, 995.00 and a principal amount of \$173,747.26.
2. No interest shall accrue for following 12 months (interest free period) after the date of execution of this stipulation, if payment of the total amount is paid in full to the Plaintiff.
3. Interest shall accrue on the total amount per the State of New York statutory interest rate after the expiration of the 12-month interest free period.
4. Defendant agrees to the entry of a consent judgment for total amount of \$211, 742.26.
5. Defendant further agrees to pay attorney fees of \$30,000.00 dollars if total amount is not paid in within the 12-month period.
6. This court shall retain jurisdiction to enforce this settlement.
7. All notices shall be sent to counsel of record.

Dated This 13th Day of January, 2025:

AGREED

INNONEO HEALTH TECHNOLOGIES INC.

By: /s/ Nicole A. Sullivan
Counsel

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Local Counsel for Defendant Innoneo Health Technologies Inc.

By: /s/ Michael C. Whitticar
Counsel


Michael C. Whitticar (V.S.B. No. 32968)
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Virginia Counsel for Defendant Innoneo Health Technologies Inc.
Pro Hac Vice Planned

EFFICIENT ENTERPRISE SOLUTIONS, LLC.

/s/ Jerry D. Haynes
Counsel

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Attorney for Plaintiff

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge
Dated: January 21, 2025
New York, New York